



————— LAW OFFICES OF —————  
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July 24, 2023

***SENT VIA ECF***

The Honorable Paul G. Gardephe  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 1007

***Re: U.S. v. Silva, et al., 23 Cr 204 (PGG)***

Your Honor:

I represent Emmanuel Perez in the above-captioned matter and pursuant to the Criminal Justice Act (CJA). I write to respectfully request the Court appoint David Bertan as co-counsel to assist me in this matter.

As the Court is aware, this case involves ten (10) defendants and the government has advised that it intends to provide complicated and voluminous Rule 16 discovery, over the course of 90 days, including law enforcement reports, videos of 8 shootings, schemes to defraud, search warrants and returns, social media, and extractions and mapping of approximately 12 cell phones subscribed to the defendants and/or other individuals. Mr. Bertan and I have co-counseled multiple cases together and I expect that Mr. Bertan's involvement in this case will substantially assist in providing the best defense team to Mr. Perez. I further request that Mr. Bertan receive the standard CJA rate of \$164 for appointed counsel as he has been a member of the SDNY Panel for over 10 years.

For the Court's convenience, we have included a "So Ordered" line should the Court grant our request. Thank you for your time and consideration.

Respectfully submitted,

/s/ Jacqueline E. Cistaro

SO ORDERED

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Honorable Paul G. Gardephe, U.S.D.J.

Dated: July 25, 2023